

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Robert Holt, et al. v. National Football
League, et al. (Plaintiff Ryan Hannam
and April Hannam ONLY)

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS RYAN HANNAM
AND APRIL HANNAM**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Ryan Hannam and April Hannam only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Ryan Hannam and April Hannam.

2. Thereafter on October 8, 2012 Plaintiffs filed a Notice of Voluntary Dismissal of their claim.

3. Since then, Plaintiffs Ryan Hannam, April Hannam have terminated the undersigned as their counsel.

4. Plaintiffs' counsel properly notified Ryan Hannam and April Hannam of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Ryan Hannam and April Hannam only in Court File No. 2:12-cv-4185-AB.

Dated: May 30, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

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